

Facility: Olympic
Date: 7/13/2011

[illegible]



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

Facility Follow-up Documentation

Facility: Univar - Olympic Chemical
Address: Tacoma, WA
Date: 7-13-2011
Facility Representative: Geoff Black
EPA Representative: Charles Wilson

The above named facility underwent a Risk Management Plan (RMP) inspection on the noted date. The EPA inspection involved reviewing specific documentation related to the implementation and maintenance of the RMP. On the date of the inspection the following items were said to be in existence but were not available for review. EPA agrees to allow the above named facility two (2) weeks from the date of the inspection to forward the listed documentation to Javier Morales, 112(r) Enforcement Coordinator at Office of Environmental Cleanup U.S. Environmental Protection Agency 1200 Sixth Avenue, Suite 900, Mail Stop ECL-116 Seattle, Washington 98101.

Note: Documentation can not be generated to replace the missing items. The EPA retains the right to reject any documentation under this allowance.

1. DOCUMENTATION FOR CSC ENVIRONMENTAL RECEPTORS
68.33 (a) 68.33 (b)

Schulz 2. ~~CONTRACTOR INFORMATION FOR THE COMPANY~~
~~THIS REPLACES THE PARTIAL~~

3. 2004 PHA RESOLUTION OF RECOMMENDATION.

4.

5.

(1) RMP Program Level 3 Process Checklist

Facility Name:

Olympic Chen

Inspector:

*S Allen***Section A – Management [68.15]**

Has the owner or operator:

| | | | |
|--|---------------------------------------|----------------------------|---|
| 1. Developed a management system to oversee the implementation of the risk management program elements? [68.15(a)] | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> N/A |
| 2. Assigned a qualified person or position that has the overall responsibility for the development, implementation, and integration of the risk management program elements? [68.15(b)] | <input checked="" type="checkbox"/> Y | <input type="checkbox"/> N | <input type="checkbox"/> N/A |
| 3. Documented other persons responsible for implementing individual requirements of the risk management program and defined the lines of authority through an organization chart or similar document? [68.15(c)] | <input type="checkbox"/> Y | <input type="checkbox"/> N | <input checked="" type="checkbox"/> N/A |

(2) RMP Program Level 3 Process ChecklistFacility Name: **OLYMIC CHEMICAL**Inspector: **BOB HACES****Section B: Hazard Assessment [68.20-68.42]****Hazard Assessment: Offsite consequence analysis parameters [68.22]**

| | |
|--|---|
| 1. Used the following endpoints for offsite consequence analysis for a worst-case scenario: [68.22(a)] <input checked="" type="checkbox"/> For toxics: the endpoints provided in Appendix A of 40 CFR Part 68? [68.22(a)(1)] <input type="checkbox"/> For flammables: an explosion resulting in an overpressure of 1 psi? [68.22(a)(2)(i)]; or <input type="checkbox"/> For flammables: a fire resulting in a radiant heat/exposure of 5 kw/m ² for 40 seconds? [68.22(a)(2)(ii)] <input type="checkbox"/> For flammables: a concentration resulting in a lower flammability limit, as provided in NFPA documents or other generally recognized sources? [68.22(a)(2)(iii)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 2. Used the following endpoints for offsite consequence analysis for an alternative release scenario: [68.22(a)] <input checked="" type="checkbox"/> For toxics: the endpoints provided in Appendix A of 40 CFR Part 68? [68.22(a)(1)] <input type="checkbox"/> For flammables: an explosion resulting in an overpressure of 1 psi? [68.22(a)(2)(i)] <input type="checkbox"/> For flammables: a fire resulting in a radiant heat/exposure of 5 kw/m ² for 40 seconds? [68.22(a)(2)(ii)] <input type="checkbox"/> For flammables: a concentration resulting in a lower flammability limit, as provided in NFPA documents or other generally recognized sources? [68.22(a)(2)(iii)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 3. Used appropriate wind speeds and stability classes for the release analysis? [68.22(b)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 4. Used appropriate ambient temperature and humidity values for the release analysis? [68.22(c)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 5. Used appropriate values for the height of the release for the release analysis? [68.22(d)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 6. Used appropriate surface roughness values for the release analysis? [68.22(e)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 7. Do tables and models, used for dispersion analysis of toxic substances, appropriately account for dense or neutrally buoyant gases? [68.22(f)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 8. Were liquids, other than gases liquefied by refrigeration only, considered to be released at the highest daily maximum temperature, based on data for the previous three years appropriate for a stationary source, or at process temperature, whichever is higher? [68.22(g)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |

Hazard Assessment: Worst-case release scenario analysis [68.25]

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|---|---|
| 9. Analyzed and reported in the RMP one worst-case release scenario estimated to create the greatest distance to an endpoint resulting from an accidental release of a regulated toxic substance from covered processes under worst-case conditions? [68.25(a)(2)(i)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 10. Analyzed and reported in the RMP one worst-case release scenario estimated to create the greatest distance to an endpoint resulting from an accidental release of a regulated flammable substance from covered processes under worst-case conditions? [68.25(a)(2)(ii)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 11. Analyzed and reported in the RMP additional worst-case release scenarios for a hazard class if the worst-case release from another covered process at the stationary source potentially affects public receptors different from those potentially affected by the worst-case release scenario developed under 68.25(a)(2)(i) or 68.25(a)(2)(ii)? [68.25(a)(2)(iii)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |

(2) RMP Program Level 3 Process Checklist**Facility Name:**

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|---|---|
| 12. Has the owner or operator determined the worst-case release quantity to be the greater of the following: [68.25(b)] <input checked="" type="checkbox"/> If released from a vessel, the greatest amount held in a single vessel, taking into account administrative controls that limit the maximum quantity? [68.25(b)(1)] <input type="checkbox"/> If released from a pipe, the greatest amount held in the pipe, taking into account administrative controls that limit the maximum quantity? [68.25(b)(2)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 13.a. Has the owner or operator for <u>toxic substances</u> that are <u>normally gases</u> at <u>ambient temperature</u> and handled as a gas or liquid under pressure: | |
| 13.a.(1) Assumed the whole quantity in the vessel or pipe would be released as a gas over 10 minutes? [68.25(c)(1)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 13.a.(2) Assumed the release rate to be the total quantity divided by 10, if there are no passive mitigation systems in place? [68.25(c)(1)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 13.b. Has the owner or operator for <u>toxic gases</u> handled as <u>refrigerated liquids</u> at <u>ambient pressure</u> : | |
| 13.b.(1) Assumed the substance would be released as a gas in 10 minutes, if not contained by passive mitigation systems or if the contained pool would have a depth of 1 cm or less? [68.25(c)(2)(i)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 13.b.(2) [Optional for owner / operator] Assumed the quantity in the vessel or pipe would be spilled instantaneously to form a liquid pool, if the released substance would be contained by passive mitigation systems in a pool with a depth greater than 1 cm? [68.25(c)(2)(ii)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 13.b.(3) Calculated the volatilization rate at the boiling point of the substance and at the conditions specified in 68.25(d)? [68.25(c)(2)(ii)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 13.c. Has the owner or operator for <u>toxic substances</u> that are <u>normally liquids</u> at <u>ambient temperature</u> : | |
| 13.c.(1) Assumed the quantity in the vessel or pipe would be spilled instantaneously to form a liquid pool? [68.25(d)(1)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 13.c.(2) Determined the surface area of the pool by assuming that the liquid spreads to 1 cm deep, if there is no passive mitigation system in place that would serve to contain the spill and limit the surface area, or if passive mitigation is in place, was the surface area of the contained liquid used to calculate the volatilization rate? [68.25(d)(1)(i)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 13.c.(3) Taken into account the actual surface characteristics, if the release would occur onto a surface that is not paved or smooth? [68.25(d)(1)(ii)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 13.c.(4) Determined the volatilization rate by accounting for the highest daily maximum temperature in the past three years, the temperature of the substance in the vessel, and the concentration of the substance if the liquid spilled is a mixture or solution? [68.25(d)(2)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 13.c.(5) Determined the rate of release to air from the volatilization rate of the liquid pool? [68.25(d)(3)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 13.c.(6) Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.25(d)(3)] What modeling technique did the owner or operator use? [68.25(g)] _____ | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 13.d. Has the owner or operator for <u>flammables</u> : | |
| 13.d.(1) Assumed the quantity in a vessel(s) of flammable gas held as a gas or liquid under pressure or refrigerated gas released to an undiked area vaporizes resulting in a vapor cloud explosion? [68.25(e)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 13.d.(2) For refrigerated gas released to a contained area or liquids released below their atmospheric boiling point, assumed the quantity volatilized in 10 minutes results in a vapor cloud? [68.25(f)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |

(2) RMP Program Level 3 Process Checklist **Facility Name:**

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|--|---|
| 13.d.(3) Assumed a yield factor of 10% of the available energy is released in the explosion for determining the distance to the explosion endpoint, if the model used is based on TNT-equivalent methods? [68.25(e)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 14. Used the parameters defined in 68.22 to determine distance to the endpoints? [68.25(g)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 15. Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.25(g)] What modeling technique did the owner or operator use? [68.25(g)] <u>RMP COMP</u> | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 16. Ensured that the passive mitigation system, if considered, is capable of withstanding the release event triggering the scenario and will still function as intended? [68.25(h)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 17. Considered also the following factors in selecting the worst-case release scenarios: [68.25(i)] <input type="checkbox"/> Smaller quantities handled at higher process temperature or pressure? [68.25(i)(1)] <input checked="" type="checkbox"/> Proximity to the boundary of the stationary source? [68.25(i)(2)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| Hazard Assessment: Alternative release scenario analysis [68.28] | |
| 18. Identified and analyzed at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one alternative release scenario to represent all flammable substances held in covered processes? [68.28(a)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 19. Selected a scenario: [68.28(b)] <input type="checkbox"/> That is more likely to occur than the worst-case release scenario under 68.25? [68.28(b)(1)(i)] <input type="checkbox"/> That will reach an endpoint off-site, unless no such scenario exists? [68.28(b)(1)(ii)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 20. Considered release scenarios which included, but are not limited to, the following: [68.28(b)(2)] <input checked="" type="checkbox"/> Transfer hose releases due to splits or sudden hose uncoupling? [68.28(b)(2)(i)] <input checked="" type="checkbox"/> Process piping releases from failures at flanges, joints, welds, valves and valve seals, and drains or bleeds? [68.28(b)(2)(ii)] <input type="checkbox"/> Process vessel or pump releases due to cracks, seal failure, or drain, bleed, or plug failure? [68.28(b)(2)(iii)] <input type="checkbox"/> Vessel overfilling and spill, or overpressurization and venting through relief valves or rupture disks? [68.28(b)(2)(iv)] <input type="checkbox"/> Shipping container mishandling and breakage or puncturing leading to a spill? [68.28(b)(2)(v)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 21. Used the parameters defined in 68.22 to determine distance to the endpoints? [68.28(c)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 22. Determined the rate of release to air by using the methodology in the RMP Offsite Consequence Analysis Guidance, any other publicly available techniques that account for the modeling conditions and are recognized by industry as applicable as part of current practices, or proprietary models that account for the modeling conditions may be used provided the owner or operator allows the implementing agency access to the model and describes model features and differences from publicly available models to local emergency planners upon request? [68.28(c)] What modeling technique did the owner or operator use? [68.25(g)] <u>RMP COMP</u> | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 23. Ensured that the passive and active mitigation systems, if considered, are capable of withstanding the release event triggering the scenario and will be functional? [68.28(d)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 24. Considered the following factors in selecting the alternative release scenarios: [68.28(e)] <input type="checkbox"/> The five-year accident history provided in 68.42? [68.28(e)(1)] <input checked="" type="checkbox"/> Failure scenarios identified under 68.50? [68.28(e)(2)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

(2) RMP Program Level 3 Process Checklist

Facility Name:

Hazard Assessment: Defining off-site impacts–Population [68.30]

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|--|---|
| 25. Estimated population that would be included in the distance to the endpoint in the RMP based on a circle with the point of release at the center? [68.30(a)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 26. Identified the presence of institutions, parks and recreational areas, major commercial, office, and industrial buildings in the RMP? [68.30(b)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 27. Used most recent Census data, or other updated information to estimate the population? [68.30(c)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 28. Estimated the population to two significant digits? [68.30(d)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

Hazard Assessment: Defining off-site impacts–Environment [68.33]

- | | |
|---|--|
| 29. Identified environmental receptors that would be included in the distance to the endpoint based on a circle with the point of release at the center? [68.33(a)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 30. Relied on information provided on local U.S.G.S. maps, or on any data source containing U.S.G.S. data to identify environmental receptors? [Source may have used LandView to obtain information] [68.33(b)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

Hazard Assessment: Review and update [68.36]

- | | |
|---|---|
| 31. Reviewed and updated the off-site consequence analyses at least once every five years? [68.36(a)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 32. Completed a revised analysis and submit a revised RMP within six months of a change in processes, quantities stored or handled, or any other aspect that might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more? [68.36(b)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |

Hazard Assessment: Documentation [68.39]

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|---|---|
| 33. For worst-case scenarios: a description of the vessel or pipeline and substance selected, assumptions and parameters used, the rationale for selection, and anticipated effect of the administrative controls and passive mitigation on the release quantity and rate? [68.39(a)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 34. For alternative release scenarios: a description of the scenarios identified, assumptions and parameters used, the rationale for the selection of specific scenarios, and anticipated effect of the administrative controls and mitigation on the release quantity and rate? [68.39(b)] | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A |
| 35. Documentation of estimated quantity released, release rate, and duration of release? [68.39(c)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 36. Methodology used to determine distance to endpoints? [68.39(d)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 37. Data used to estimate population and environmental receptors potentially affected? [68.39(e)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

Hazard Assessment: Five-year accident history [68.42]

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|--|---|
| 38. Has the owner or operator included all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage? [68.42(a)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
|--|---|

Follow up

(2) RMP Program Level 3 Process Checklist**Facility Name:**

39. Has the owner or operator reported the following information for each accidental release: [68.42(b)]

☐ Y ☐ N ☒ N/A

- ☐ Date, time, and approximate duration of the release? [68.42(b)(1)]
- ☐ Chemical(s) released? [68.42(b)(2)]
- ☐ Estimated quantity released in pounds and percentage weight in a mixture (toxics)? [68.42(b)(3)]
- ☐ NAICS code for the process? [68.42(b)(4)]
- ☐ The type of release event and its source? [68.42(b)(5)]
- ☐ Weather conditions (if known)? [68.42(b)(6)]
- ☐ On-site impacts? [68.42(b)(7)]
- ☐ Known offsite impacts? [68.42(b)(8)]
- ☐ Initiating event and contributing factors (if known)? [68.42(b)(9)]
- ☐ Whether offsite responders were notified (if known)? [68.42(b)(10)]
- ☐ Operational or process changes that resulted from investigation of the release? [68.42(b)(11)]

(3) RMP Program Level 3 Process Checklist

Facility Name:

Clower / Olympia Chem

Inspector:

*C. W. Dean***Section C: Prevention Program****Prevention Program- Safety information [68.65]**

1. Has the owner or operator compiled written process safety information, which includes information pertaining to the hazards of the regulated substances used or produced by the process, information pertaining to the technology of the process, and information pertaining to the equipment in the process, before conducting any process hazard analysis required by the rule? [68.65(a)]

☒ Y ☐ N ☐ N/A

Does the process safety information contain the following for hazards of the substances: [68.65(b)]

- ☒ Material Safety Data Sheets (MSDS) that meet the requirements of the OSHA Hazard Communication Standard [29 CFR 1910.1200(g)]? [68.48(a)(1)]
- ☒ Toxicity information? [68.65(b)(1)]
- ☒ Permissible exposure limits? [68.65(b)(2)]
- ☐ Physical data? [68.65(b)(3)]
- ☒ Reactivity data? [68.65(b)(4)]
- ☒ Corrosivity data? [68.65(b)(5)]
- ☒ Thermal and chemical stability data? [68.65(b)(6)]
- ☐ Hazardous effects of inadvertent mixing of materials that could foreseeably occur? [68.65(b)(7)]

*op man doc btlc
for operations
manual*

2. Has the owner documented information pertaining to technology of the process?

☐ Y ☐ N ☐ N/A

- ☒ A block flow diagram or simplified process flow diagram? [68.65(c)(1)(i)] *PHIO, BLOCK*
- ☒ Process chemistry? [68.65(c)(1)(ii)] *PHA I-1*
- ☒ Maximum intended inventory? [68.65(c)(1)(iii)] *1 Rail Car, 180K lbs*
- ☒ Safe upper and lower limits for such items as temperatures, pressures, flows, or compositions? [68.65(c)(1)(iv)] *Waste*
- ☐ An evaluation of the consequences of deviation? [68.65(c)(1)(iv)] *OPMAN P27 4.4-3 PH - alkanes, product Varies flow - slow process*

3. Does the process safety information contain the following for the equipment in the process: [68.65(d)(1)]

☒ Y ☐ N ☐ N/A

- ☒ Materials of construction? [68.65(d)(1)(i)] *IMOC specs for upgrad 1/50th weld*
- ☒ Piping and instrumentation diagrams [68.65(d)(1)(ii)] *OPMAN 42 Specs shop drawl Spec w/ ANSI 300 11 pages press test Spec WVR DA-12 6/95 ASME Bolev 4 Proc Cod 1X*
- ☐ Electrical classification? [68.65(d)(1)(iii)] *N/A*
- ☒ Relief system design and design basis? [68.65(d)(1)(iv)] *DMC specs SO₂ CGA 63-1988 SO₂ per OPMAN P1, 1.1.0*
- ☐ Ventilation system design? [68.65(d)(1)(v)] *N/A*
- ☒ Design codes and standards employed? [68.65(d)(1)(vi)] *weld proc specs, Hydro test CGA 63-1988 page 1 OPMAN 1.1.1 SO₂ Handling*
- ☐ Material and energy balances for processes built after June 21, 1999? [68.65(d)(1)(vii)] *N/A*
- ☐ Safety systems? [68.65(d)(1)(viii)] *descrite in CO material POWERL SYST*

4. Has the owner or operator documented that equipment complies with recognized and generally accepted good engineering practices? [68.65(d)(2)]

☒ Y ☐ N ☐ N/A

5. Has the owner or operator determined and documented that existing equipment, designed and constructed in accordance with codes, standards, or practices that are no longer in general use, is designed, maintained, inspected, tested, and operating in a safe manner? [68.65(d)(3)]

☒ Y ☐ N ☒ N/A*Plan 1976 Feb*

(4) RMP Program Level 3 Process ChecklistFacility Name: **OLYMPIC CANY**Inspector: **BIB HALE****Section C: Prevention Program – Process Hazard Analysis****Prevention Program- Process Hazard Analysis [68.67]**

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|---|---|
| 6. Has the owner or operator performed an initial process hazard analysis (PHA), and has this analysis identified, evaluated, and controlled the hazards involved in the process? [68.67(a)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 7. Has the owner or operator determined and documented the priority order for conducting PHAs, and was it based on an appropriate rationale? [68.67(a)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 8. Has the owner used one or more of the following technologies to conduct process PHA: [68.67(b)] <input checked="" type="checkbox"/> What-if? [68.67(b)(1)] <input type="checkbox"/> Checklist? [68.67(b)(2)] <input type="checkbox"/> What-if/Checklist? [68.67(b)(3)] <input type="checkbox"/> Hazard and Operability Study (HAZOP) [68.67(b)(4)] <input type="checkbox"/> Failure Mode and Effects Analysis (FMEA) [68.67(b)(5)] <input type="checkbox"/> Fault Tree Analysis? [68.67(b)(6)] <input type="checkbox"/> An appropriate equivalent methodology? [68.67(b)(7)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 9. Did the PHA address: <input checked="" type="checkbox"/> The hazards of the process? [68.67(c)(1)] <input checked="" type="checkbox"/> Identification of any incident that had a likely potential for catastrophic consequences? [68.67(c)(2)] <input checked="" type="checkbox"/> Engineering and administrative controls applicable to hazards and interrelationships? [68.67(c)(3)] <input checked="" type="checkbox"/> Consequences of failure of engineering and administrative controls? [68.67(c)(4)] <input checked="" type="checkbox"/> Stationary source siting? [68.67(c)(5)] <input type="checkbox"/> Human factors? [68.67(c)(6)] <input checked="" type="checkbox"/> An evaluation of a range of the possible safety and health effects of failure of controls? [68.67(c)(7)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 10. Was the PHA performed by a team with expertise in engineering and process operations and did the team include appropriate personnel? [68.67(d)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 11. Has the owner or operator established a system to promptly address the team's findings and recommendations; assured that the recommendations are resolved in a timely manner and documented; documented what actions are to be taken; completed actions as soon as possible; developed a written schedule of when these actions are to be completed; and communicated the actions to operating, maintenance, and other employees whose work assignments are in the process and who may be affected by the recommendations? [68.67(e)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A FOLLOW UP 2004 RESOLUTIONS |
| 12. Has the PHA been updated and revalidated by a team every five years after the completion of the initial PHA to assure that the PHA is consistent with the current process? [68.67(f)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 13. Has the owner or operator retained PHAs and updates or revalidations for each process covered, as well as the resolution of recommendations for the life of the process? [68.67(g)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

(5) RMP Program Level 3 Process Checklist

Facility Name:

Univ. of Memphis

Inspector:

*C. L. L. L.***Section C: Prevention Program-Operating Procedures****Prevention Program- Operating procedures [68.69]**

14. Has the owner or operator developed and implemented written operating procedures that provide instructions or steps for conducting activities associated with each covered process consistent with the safety information? [68.69(a)]

☒ Y ☐ N ☐ N/A

15. Do the procedures address the following: [68.69(a)]

☒ Y ☐ N ☐ N/ASteps for each operating phase: [68.69(a)(1)]☐ Initial Startup? [68.69(a)(1)(i)]*"To Be filled in"*☒ Normal operations? [68.69(a)(1)(ii)]*P 25 OPMAN 4.5, 2 and after**N/A* ☐ Temporary operations? [68.69(a)(1)(iii)]☐ Emergency shutdown including the conditions under which emergency shutdown is required, and the assignment of shutdown responsibility to qualified operators to ensure that emergency shutdown is executed in a safe and timely manner? [68.69(a)(1)(iv)]*N/A* ☐ Emergency operations? [68.69(a)(1)(v)]☒ Normal shutdown? [68.69(a)(1)(vi)]*P 32 OPMAN 4.5.13*☒ Startup following a turnaround, or after emergency shutdown? [68.69(a)(1)(vii)]*false plans*Operating limits: [68.69(a)(2)]*Obvious* ☒ Consequences of deviations [68.69(a)(2)(i)]☐ Steps required to correct or avoid deviation? [68.69(a)(2)(ii)]Safety and health considerations: [68.69(a)(3)]☒ Properties of, and physical hazards presented by, the chemicals used in the process [68.69(a)(3)(i)]☒ Precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment? [68.69(a)(3)(ii)]☒ Control measures to be taken if physical contact or airborne exposure occurs? [68.69(a)(3)(iii)]*P 4.8.9 Contingency Plan*
Control of analysis
☐ Quality control for raw materials and control of hazardous chemical inventory levels? [68.69(a)(3)(iv)]*instructed to stop**N/A* ☐ Any special or unique hazards? [68.69(a)(3)(v)]☒ Safety systems and their functions? [68.69(a)(4)]*Panel system Manual*

16. Are operating procedures readily accessible to employees who are involved in a process? [68.69(b)]

☒ Y ☐ N ☐ N/A

17. Has the owner or operator certified annually that the operating procedures are current and accurate and that procedures have been reviewed as often as necessary? [68.69(c)]

☒ Y ☐ N ☐ N/A

18. Has the owner or operator developed and implemented safe work practices to provide for the control of hazards during specific operations, such as lockout/tagout? [68.69(d)]

☒ Y ☐ N ☐ N/A*Control system specifications 28CFR 1910.147*
40 cc

(6) RMP Program Level 3 Process Checklist

Facility Name:

Fones Olympic Chem

Inspector:

*S Allen***Section C: Prevention Program- Training****Prevention Program - Training [68.71]**

- | | |
|--|---|
| 19. Has each employee involved in operating a process, and each employee before being involved in operating a newly assigned process, been initially trained in an overview of the process and in the operating procedures? [68.71(a)(1)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 20. Did initial training include emphasis on safety and health hazards, emergency operations including shutdown, and safe work practices applicable to the employee's job tasks? [68.71(a)(1)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 21. In lieu of initial training for those employees already involved in operating a process on June 21, 1999, an owner or operator may certify in writing that the employee has the required knowledge, skills, and abilities to safely carry out the duties and responsibilities as specified in the operating procedures [68.71(a)(2)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 22. Has refresher training been provided at least every three years, or more often if necessary, to each employee involved in operating a process to assure that the employee understands and adheres to the current operating procedures of the process? [68.71(b)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 23. Has owner or operator ascertained and documented in record that each employee involved in operating a process has received and understood the training required? [68.71(c)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 24. Does the prepared record contain the identity of the employee, the date of the training, and the means used to verify that the employee understood the training? [68.71(c)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

Safety
SO2, SOPs - 5-09
SO2 12/09
3/10

3-10 method: video, Lesson Plan, Test, answers for lift

- certifies training & testing has been completed - sign off by trainee

(7) RMP Program Level 3 Process ChecklistFacility Name: **OLYMPIO CHEMICAL**Inspector: **BOB HALES****Section C: Prevention Program- Mechanical Integrity****Prevention Program - Mechanical Integrity [68.73]**

| | |
|---|---|
| 25. Has the owner or operator established and implemented written procedures to maintain the on-going integrity of the process equipment listed in 68.73(a)? [68.73(b)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 26. Has the owner or operator trained each employee involved in maintaining the on-going integrity of process equipment? [68.73(c)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 27. Performed inspections and tests on process equipment? [68.73(d)(1)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 28. Followed recognized and generally accepted good engineering practices for inspections and testing procedures? [68.73(d)(2)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 29. Ensured the frequency of inspections and tests of process equipment is consistent with applicable manufacturers' recommendations, good engineering practices, and prior operating experience? [68.73(d)(3)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 30. Documented each inspection and test that had been performed on process equipment, which identifies the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test? [68.73(d)(4)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 31. Corrected deficiencies in equipment that were outside acceptable limits defined by the process safety information before further use or in a safe and timely manner when necessary means were taken to assure safe operation? [68.73(e)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 32. Assured that equipment as it was fabricated is suitable for the process application for which it will be used in the construction of new plants and equipment? [68.73(f)(1)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 33. Performed appropriate checks and inspections to assure that equipment was installed properly and consistent with design specifications and the manufacturer's instructions? [68.73(f)(2)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 34. Assured that maintenance materials, spare parts and equipment were suitable for the process application for which they would be used? [68.73(f)(3)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

(8) RMP Program Level 3 Process ChecklistFacility Name: OLIMPIC CARMInspector: BOB HALLS**Section C: Prevention Program-Management of Change****Prevention Program - Management Of Change [68.75]**

| | |
|---|---|
| 35. Has the owner or operator established and implemented written procedures to manage changes to process chemicals, technology, equipment, and procedures, and changes to stationary sources that affect a covered process? [68.75(a)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 36. Do procedures assure that the following considerations are addressed prior to any change: [68.75(b)] <input type="checkbox"/> The technical basis for the proposed change? [68.75(b)(1)] <input type="checkbox"/> Impact of change on safety and health? [68.75(b)(2)] <input type="checkbox"/> Modifications to operating procedures? [68.75(b)(3)] <input type="checkbox"/> Necessary time period for the change? [68.75(b)(4)] <input type="checkbox"/> Authorization requirements for the proposed change? [68.75(b)(5)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 37. Were employees, involved in operating a process and maintenance, and contract employees, whose job tasks would be affected by a change in the process, informed of, and trained in, the change prior to start-up of the process or affected parts of the process? [68.75(c)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 38. If a change resulted in a change in the process safety information, was such information updated accordingly? [68.75(d)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 39. If a change resulted in a change in the operating procedures or practices, had such procedures or practices been updated accordingly? [68.75(e)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

(9) RMP Program Level 3 Process Checklist

Facility Name: OLYMPIC CAFE

Inspector: BOB HALES

Section C: Prevention Program- Pre-startup Safety Review

Prevention Program - Pre-startup Safety Review [68.77]

40. If the facility installed a new stationary source, or significantly modified an existing source, (as discussed at 68.77(a)) did it perform a pre-startup safety review prior to the introduction of a regulated substance to a process to confirm: [68.77(b)]

☐ Y ☐ N ☒ N/A

- ☐ Construction and equipment was in accordance with design specifications? [68.77(b)(1)]
- ☐ Safety, operating, maintenance, and emergency procedures were in place and were adequate? [68.77(b)(2)]
- ☐ For new stationary sources, a process hazard analysis had been performed and recommendations had been resolved or implemented before startup? [68.77(b)(3)]
- ☐ Modified stationary sources meet the requirements contained in management of change? [68.77(b)(3)]
- ☐ Training of each employee involved in operating a process had been completed? [68.77(b)(4)]

(10) RMP Program Level 3 Process Checklist

Facility Name:

Olympic Chem

Inspector:

Saller

Section C: Prevention Program- Compliance Audits**Prevention Program - Compliance audits [68.79]**

- | | |
|--|---|
| 41. Has the owner or operator certified that the stationary source has evaluated compliance with the provisions of the prevention program at least every three years to verify that the developed procedures and practices are adequate and being followed? [68.79(a)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 42. Has the audit been conducted by at least one person knowledgeable in the process? [68.79(b)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 43. Are the audit findings documented in a report? [68.79(c)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 44. Has the owner or operator promptly determined and documented an appropriate response to each of the findings of the audit and documented that deficiencies had been corrected? [68.79(d)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 45. Has the owner or operator retained the two most recent compliance reports? [68.79(e)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

12/03 -

12/06 CA

12/10 - # 10 No written
preventive maintenance - no comment

(11) RMP Program Level 3 Process Checklist

Facility Name:

Olympic Chen

Inspector:

*S Allen***Section C: Prevention Program****Prevention Program - Incident investigation [68.81]**

- | | |
|---|--|
| 46. Has the owner or operator investigated each incident that resulted in, or could reasonably have resulted in a catastrophic release of a regulated substance? [68.81(a)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 47. Were all incident investigations initiated not later than 48 hours following the incident? [68.81(b)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 48. Was an accident investigation team established and did it consist of at least one person knowledgeable in the process involved, including a contract employee if the incident involved work of a contractor, and other persons with appropriate knowledge and experience to thoroughly investigate and analyze the incident? [68.81(c)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 49. Was a report prepared at the conclusion of every investigation? [68.81(d)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 50. Does every report include: [68.81(d)] <input checked="" type="checkbox"/> Date of incident? [68.81(d)(1)] <input checked="" type="checkbox"/> Date investigation began? [68.81(d)(2)] <input checked="" type="checkbox"/> A description of the incident? [68.81(d)(3)] <input checked="" type="checkbox"/> The factors that contributed to the incident? [68.81(d)(4)] <input checked="" type="checkbox"/> Any recommendations resulting from the investigation? [68.81(d)(5)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 51. Has the owner or operator established a system to address and resolve the report findings and recommendations, and are the resolutions and corrective actions documented? [68.81(e)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 52. Was the report reviewed with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable? [68.81(f)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 53. Has the owner or operator retained incident investigation reports for at least five years? [68.81(g)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |

(12) RMP Program Level 3 Process Checklist

Facility Name: *Olympic Chem*

Inspector: *S Allen*

Section D - Employee Participation [68.83]

- | | |
|---|---|
| 1. Has the owner or operator developed a written plan of action regarding the implementation of the employee participation required by this section? [68.83(a)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 2. Has the owner or operator consulted with employees and their representatives on the conduct and development of process hazards analyses and on the development of the other elements of process safety management in chemical accident prevention provisions? [68.83(b)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 3. Has the owner or operator provided to employees and their representatives access to process hazards analyses and to all other information required to be developed under the chemical accident prevention rule? [68.83(c)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

(13) RMP Program Level 3 Process Checklist

Facility Name: OLYMPIC CASY.

Inspector:

Section E - Hot Work Permit [68.85]

- | | |
|--|---|
| 1. Has the owner or operator issued a hot work permit for each hot work operation conducted on or near a covered process? [68.85(a)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 2. Does the permit document that the fire prevention and protection requirements in 29CFR 1910.252(a) have been implemented prior to beginning the hot work operations? [68.85(b)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 3. Does the permit indicate the date(s) authorized for hot work and the object(s) upon which hot work is to be performed? [68.85(b)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 4. Are the permits being kept on file until completion of the hot work operations? [68.85(b)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

(14) Section F - Contractors [68.87]Facility: **OLYMPIC CHEMICAL**Inspector: **BOB HALES**

| | |
|--|---|
| 1. Has the owner or operator obtained and evaluated information regarding the contract owner or operator's safety performance and programs when selecting a contractor? [68.87(b)(1)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 2. Informed contract owner or operator of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the process? [68.87(b)(2)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 3. Explained to the contract owner or operator the applicable provisions of the emergency response or the emergency action program? [68.87(b)(3)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 4. Developed and implemented safe work practices consistent with §68.69(d), to control the entrance, presence, and exit of the contract owner or operator and contract employees in the covered process areas? [68.87(b)(4)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 5. Periodically evaluated the performance of the contract owner or operator in fulfilling their obligations (as described at 68.87(c)(1) – (c)(5))? [68.87(b)(5)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

PENDING FOLLOW UP.

THEY DO HAVE A CONTRACTOR PROGRAM

| | | |
|---|--|---|
| (15) Section G - Emergency Response [68.90 - 68.95] | | Facility: <i>Olympic Chem</i> |
| | | Inspector: <i>S Allen</i> |
| 1. Is the facility designated as a "first responder" in case of an accidental release of regulated substances? | | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> N/A |
| 1.a. If the facility is not a first responder: | | |
| 1.a.(1) For stationary sources with any regulated substances held in a process above threshold quantities, is the source included in the community emergency response plan developed under 42 U.S.C. 11003? [68.90(b)(1)] | | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 1.a.(2) For stationary sources with only regulated flammable substances held in a process above threshold quantities, has the owner or operator coordinated response actions with the local fire department? [68.90(b)(2)] | | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 1.a.(3) Are appropriate mechanisms in place to notify emergency responders when there is need for a response? [68.90(b)(3)] | | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 2. An emergency response plan is maintained at the stationary source and contains the following? [68.95(a)(1)] | | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| <input type="checkbox"/> Procedures for informing the public and local emergency response agencies about accidental releases? [68.95(a)(1)(i)] | | |
| <input type="checkbox"/> Documentation of proper first-aid and emergency medical treatment necessary to treat accidental human exposures? [68.95(a)(1)(ii)] | | |
| <input type="checkbox"/> Procedures and measures for emergency response after an accidental release of a regulated substance? [68.95(a)(1)(iii)] | | |
| 3. The emergency response plan contains procedures for the use of emergency response equipment and for its inspection, testing, and maintenance? [68.95(a)(2)] | | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 4. The emergency response plan requires, and there is documentation of, training for all employees in relevant procedures? [68.95(a)(3)] | | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 5. The owner or operator has developed and implemented procedures to review and update, as appropriate, the emergency response plan to reflect changes at the stationary source and ensure that employees are informed of changes? [68.95(a)(4)] | | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 6. Did the owner or operator use a written plan that complies with other Federal contingency plan regulations or is consistent with the approach in the National Response Team's Integrated Contingency Plan Guidance ("One Plan")? If so, does the plan include the elements provided in paragraph (a) of 68.95, and also complies with paragraph (c) of 68.95? [68.95(b)] | | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 7. Has the emergency response plan been coordinated with the community emergency response plan developed under EPCRA? [68.95(c)] | | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |

Revised 11/10

1a(3) pocket list?

Prepared for "incidental release response"
PPE requirements posted

(16) Section H – Risk Management Plan [40 CFR 68.190 – 68.195]**Facility:****Inspector:***Olympic ch*

| | |
|---|---|
| 1. Does the single registration form include, for each covered process, the name and CAS number of each regulated substance held above the threshold quantity in the process, the maximum quantity of each regulated substance or mixture in the process (in pounds) to two significant digits, the five- or six-digit NAICS code that most closely corresponds to the process and the Program level of the process? [68.160(b)(7)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 2. Did the facility assign the correct program level(s) to its covered process(es)? [68.160(b)(7)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 3. Has the owner or operator reviewed and updated the RMP and submitted it to EPA [68.190(a)]? Reason for update: <input checked="" type="checkbox"/> Five-year update. [68.190(b)(1)] <input type="checkbox"/> Within three years of a newly regulated substance listing. [68.190(b)(2)] <i>N/A</i> <input type="checkbox"/> At the time a new regulated substance is first present in an already regulated process above threshold quantities. [68.190(b)(3)] <i>N/A</i> <input type="checkbox"/> At the time a regulated substance is first present in a new process above threshold quantities. [68.190(b)(4)] <i>N/A</i> <input type="checkbox"/> Within six months of a change requiring revised PHA or hazard review. [68.190(b)(5)] <i>N/A</i> <input type="checkbox"/> Within six months of a change requiring a revised OCA as provided in 68.36. [68.190(b)(6)] <i>N/A</i> <input type="checkbox"/> Within six months of a change that alters the Program level that applies to any covered process. [68.190(b)(7)] <i>N/A</i> | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |
| 4. If the owner or operator experienced an accidental release that met the five-year accident history reporting criteria (as described at 68.42) subsequent to April 9, 2004, did the owner or operator submit the information required at 68.168, 68.170(j) and 68.175(l) within six months of the release or by the time the RMP was updated as required at 68.190, whichever was earlier. [68.195(a)] | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A |
| 5. If the emergency contact information required at 68.160(b)(6) has changed since June 21, 2004, did the owner or operator submit corrected information within thirty days of the change? [68.195(b)] | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A |

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 Michael Nassera
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NaHSO_3

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 down to BaSO_4

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 Photography Color fixer
 Dechlorination

USF grade for water treat

Not food grade

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 2 Prime Brown

38-42-78 Solihor
Not shipped yet due to
weight cost

NaOH 50% Pail Cell liquid
→ add to 25%

RMP Plan - Lyons
Rebusmission reason for
calendar changes, etc
Chemistry changes

(3) 90 ton Pail carts
accounted for

General 2-3 days on site
10-14 days rougher
750,000 product per railcar

Occasionally 2 cars present
simult

180k report should be
add to reflect ~~340k~~ 540k
max

Safety Review
Map Handout Pack
USD's 'email'

Safety Shower Review
Mater's Waste over 1 -
1200dB Screen

Don't Touch Reaction
Wash Hands on exit

RMP Rail car } SO
1 1/2 PIPs }

Prop formerly Richfield Oil
- old load over

Air put 105 PSI
Removes SO₂

Pacell Syst

Powell Syst

- Power Fluid
- The Press less for
- SPB actuators
- Movement of valves
- Safety Locks
- SO₂ Analysers
- Leak in line for
- Machine E stop
- 5 ppm values else
- 20 ppm alarms

Powell shift valve is second

Person in car controller for
~~Powell~~ ~~future~~ plant such
Shut off

Between plant actuators

Leak about at 47 MPa is
14 MPa to 15 MPa and it
SO₂ leak

(2) SO₂ lines supply 2nd plant

Cashier Rail Car
50% - miles in
water

Head Exchange

50%

Rail Car

much water here

if more to work

Sulfur Acid } H₂SO₄
P. R. R. R.

50% Coal Vessel
Rail Car

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Masonry etc

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Plaster Patching

Plant Fabricated 76

2nd 50% Station added 97

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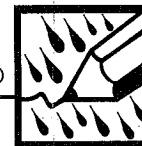
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CONTENTS

| PAGE | REFERENCE | DATE |
|------|--|------|
| | OSC | |
| | THEY USED DUMP COMP FOR THE CALC'S. THE POPULATION WAS DETERMINED USING CENSUS DATA BUT IT DID NOT RELATE TO THE CIRCLE MAP BUT WAS THE TOTAL POPULATION OF THE TOWNS LISTED IN THE CENSUS | |
| | THEIR OSC DID NOT HAVE A MAP SHOWING ENVIRONMENTAL RECEPTORS ETC. | |

MECHANICAL NECESSITY

TALES NEEDED TO PRODUCE
THEIR WRITTEN PLAN
FOR MAINTAINING THEIR
EQUIPMENT AND PROCESS

PAA

TALES HAVE RECOMMENDED
IN THE LATEST PAA THAT
REFERS TO THE ACTION
PLAN BUT THERE IS
NO MENTION OF THE PAA
AS ITEM IN SAID PLAN

CONTRACTOR PROGRESS

WANT TO HAVE THE FACILITY
SEND THE CONTRACTOR INFO
FOR THE PILING REPLACEMENT
IS ON PENDING LIST BUT
NOT CRITICAL TO THE
RESULTS. THE CONTRACTOR
WOULD HAVE BEEN ON SITE
BUT THERE WAS NO REGULATE
PROCESS WHILE HE WAS DOING
THE WORK.

NOTE:

DOCUMENT REQUEST,
SATISFIED BEFORE
LEAVING FACILITY

**"Outdoor writing products...
...for outdoor writing people."**



RECYCLABLE

"Rite in the Rain" - A unique All-Weather Writing paper created to shed water and enhance the written image. It is widely used throughout the world for recording critical field data in all kinds of weather.

Available in a variety of standard and custom printed case-bound field books, loose leaf, spiral and stapled notebooks, multi-copy sets and copier paper.

For best results, use a pencil or an all-weather pen.

a product of

J. L. DARLING CORPORATION
Tacoma, WA 98424-1017 USA
www.RiteintheRain.com

Item No. 391
ISBN: 978-1-932149-22-7

©
Made in the USA
US PAT NO: 6,863,940



6 32281 39111 1

Olympic Chen
S Allen
7.13-2011



"Rite in the Rain"®
ALL-WEATHER
JOURNAL
No. 391



Project 7-13-2011

[illegible]

Na(504)8 WW T
 paper production -
 discharges -
 neutralized WW before
 discharge -
 food processes -
 and were WH, OR
 38-70 final solution
 1976 process started
 at this site
 3, 90 T railcar, usually
 only 1 at a time

SO₂ - 2 air
 sensors at ground -
 5 ppm
 20 ppm -
 manual release -

"Outdoor writing products for outdoor writing people."



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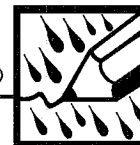
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"Rite in the Rain"
ALL-WEATHER WRITING PAPER



FIELD

All-Weather Notebook
No. 351

| |
|------------------------|
| Olympic Chemical Corp |
| 7/13/11 RMP Inspection |
| Tacoma WA |
| |

4 5/8" x 7" - 48 Numbered Pages



SINCE 1927

Portland
1-800-247-1927

Seattle
1-800-558-5368

Spokane
1-800-597-7935

7/13/11

14:10 pm arrived

Geoff Black

- Ops Manager, Tacoma

Mike Rogers (Portland)

Michael Nordvall (L.A.)

Chuck W. gave intro

Make Sodium Bisulfate

 NaHSO_3 ~~30-40%~~ (38% 40%)(NaOH + Sulfur dioxide + H_2O)

Used for de-chlorination

for such as pulp & paper

also used in wastewater treatment (1000's of uses)

Two operators are employed at the Tacoma Olympic plant

All Sulfur Dioxide (and NaOH)

brought in by railcar. 50%

Sodium Hydroxide

Room for 3 90-ton railcars

(Max would be 2 → so they should update RMP's submitted

"Miner Makes" stopped at various locations

Geoff gave safety briefing.

Fossil System

Shut valve if loss of power

" " " " " " Pneumatic
Nail car moves

5 ppm - shutdown

20 ppm - Alarms

Also have a

Manual Emergency shutdown

The plant began operations

for Sodium bisulfate in 1976.

→ 1997 Put in second

duplicate

Jan 1998 Miner bought plant.

4
7/13/14

Tour at 1640
x shows

| Time | Direc. |
|-------|--------|
| 10:00 | 100 |
| 10:10 | 100 |
| 10:20 | 100 |
| 10:30 | 100 |
| 10:40 | 100 |
| 10:50 | 100 |
| 11:00 | 100 |
| 11:10 | 100 |
| 11:20 | 100 |
| 11:30 | 100 |
| 11:40 | 100 |
| 11:50 | 100 |
| 12:00 | 100 |
| 12:10 | 100 |
| 12:20 | 100 |
| 12:30 | 100 |
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| 12:50 | 100 |
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| 8:50 | 100 |
| 9:00 | 100 |
| 9:10 | 100 |
| 9:20 | 100 |
| 9:30 | 100 |
| 9:40 | 100 |
| 9:50 | 100 |
| 10:00 | 100 |

| | | |
|------|---|------------------|
| 1494 | = | Central building |
|------|---|------------------|

1945 M: Full
Sedum, Aconitum, Thalictrum.

| | | | |
|------|---|----|--------|
| 1456 | S | 50 | delect |
|------|---|----|--------|

| | | | |
|------|---|-----------|---------------|
| 1459 | F | Pneumonia | for SDO value |
|------|---|-----------|---------------|

Conduct

| | | |
|------|---|--------------------------|
| 1500 | E | Rail car deadman switch. |
| 1600 | E | |

1503 N 22 offloading area.

| | | |
|------|---|-----------------------------|
| 1503 | N | transgenic escape responder |
|------|---|-----------------------------|

| | | |
|------|---|----------------------------|
| 1905 | W | 262 runs to press initials |
| 1905 | W | |
| 1905 | W | |

| | | |
|------|-----|-------------|
| 1900 | ATC | Impure alk. |
|------|-----|-------------|

| | | | |
|------|---|-----------------|--------|
| 1801 | B | West | mixins |
|------|---|-----------------|--------|

| | | | |
|------|---|-----------------|------|
| 1511 | N | Sodium benzoate | 1000 |
|------|---|-----------------|------|

| | | |
|------|---|----------------------------|
| 1517 | W | Duplicate Proceeds missing |
|------|---|----------------------------|

[illegible]

1614 P
Conor Penn in Central Room

7/13/11

Huddle

> b) No description of scenario (only stated "liquid spill")

✓ Check: No written statement of consequence (COMMENT only, no violations)

17:20 Closing Conference

| Bob's # | Description of |
|---------|----------------------------------|
| #34 | No |
| | Senario - No "description" could |
| | Said liquid spill. No measuring |
| | for 10 #/minute |

Note: Babus Doc request
for contractor info is
satisfied before leaving

at site 6: 10:00 am